

**JOINT CLAIM TERMS CHART – EXHIBIT 1**

The identification of evidence below includes, *inter alia*, citations to the patents asserted in this litigation: U.S. Patent No. 6,535,226 (“’226 patent”), U.S. Patent No. 6,522,325 (“’325 patent”), 9,055,234 (“’234 patent”) (collectively, the “Asserted Patents”).

The parties reserve the right to rely on or challenge any intrinsic and extrinsic evidence identified by the other party, and any evidence obtained, or that may be obtained, through claim construction discovery. The parties further reserve the right to amend, correct, or supplement their claim construction positions and supporting evidence in response to any change of position by the other party and in response to information received through claim construction discovery. The parties additionally reserve the right to rely on citations identified by either party, including any citations identified in the briefing. The parties also reserve the right to rely on additional citations to intrinsic and extrinsic evidence to rebut arguments or characterizations about that evidence made by the other party.

Terms and Phrases	Kewazinga’s Proposed Construction and Identification of Evidence	Google’s Proposed Construction and Identification of Evidence
mosaicing (’325 patent, claims 1, 5, 6; see also derivative mosaicing terms in ’234 patent, claims [1], 3, 5-7, 10, 11, [13], 16, 18-21, 24, 28, 29)	<i>creating imagery assembled from a plurality of images, or portions thereof, including an alignment process and a composition process</i>  <b><u>Intrinsic Evidence:</u></b> <ul style="list-style-type: none"> <li>’325 patent at 4:16-19, 4:28-31, 4:41-43, 12:30-32, 13:15-49, 15:9-16, Abstract</li> <li>’234 patent at 4:27-30, 4:41-56, 12:50-13:2, 16:46-48, 17:31-63, 19:21-27</li> </ul>	<i>creating imagery assembled from a plurality of camera outputs, or portions thereof, including an alignment process and a composition process to achieve a seamless combination of the camera outputs</i>  <b><u>Intrinsic Evidence:</u></b> <ul style="list-style-type: none"> <li>’234 patent at Abstract, Fig. 7a; 11, 2:8-29, 3:18-32, 4:31-56, 12:39-49, 13:22-29; 17:6-</li> </ul>

Terms and Phrases	Kewazinga's Proposed Construction and Identification of Evidence	Google's Proposed Construction and Identification of Evidence
	<ul style="list-style-type: none"> <li>U.S. Patent No. 5,649,032 ("Burt patent," incorporated by reference in '325 and '234 patents) at 1:20-34, 2:3-57, 3:39-48, 4:41-48, 5:36-6:60, Figs. 3-6, Abstract, claims 1-30</li> <li>'325 patent prosecution history at Notice of Allowability</li> </ul> <p><b><u>Extrinsic Evidence:</u></b></p> <ul style="list-style-type: none"> <li>Testimony of Dr. Jeffrey Lubin</li> <li>Although Kewazinga disputes that the Claim Construction Opinion, <i>Kewazinga Corp. v. Microsoft Corp.</i>, No. 1:18-CV-4500-GHW, 2019 WL 3423352 (S.D.N.Y. July 29, 2019) is "extrinsic evidence" within the meaning set forth in <i>Phillips v. AWH Corp.</i>, 415 F.3d 1303, 1317-18 (Fed. Cir. 2005), Kewazinga may cite it as well</li> <li>Although Kewazinga disputes that briefing, filings, and deposition transcripts in <i>Kewazinga Corp. v. Microsoft Corp.</i>, No.1:18-cv-4500-GHW (S.D.N.Y.) is "extrinsic evidence" within the meaning set forth in <i>Phillips v. AWH Corp.</i>, 415 F.3d 1303, 1317-18 (Fed. Cir. 2005), Kewazinga may cite them as well</li> </ul>	<p>15, 17:30-63; 17:64-18:43; 19:21-28; cl. 1-30.</p> <ul style="list-style-type: none"> <li>'325 patent at Abstract, Figs. 7a, 11; 2:1-20, 2:66-3:16, 4:20-43, 12:59-67, 13:15-14:30, 15:9-16; cl. 1-30.</li> <li>U.S. Patent No. 5,649,032 ("Burt patent," incorporated by reference in '325 and '234 patents) at 1:20-33, 2:3-41, 3:39-45, 4:41-44, 5:36-6:60, 11:25-14, Figs. 3-6, 9; claim 1; Abstract</li> <li>'325 patent prosecution history at <ul style="list-style-type: none"> <li>1/15/2002 office action; 7/23/2002 response to office action and amendment</li> <li>"QuickTime VR – an Image-Based Approach to Virtual Environment Navigation," Shenchang Eric Chen, Apple Computer, Inc. at 4.</li> <li>U.S. Pat. No. 5,495,576 ("Ritchey") at Abstract, Figs. 1, 15-18; 1:22-38, 8:61-67, 10:17-30, 11:31-54, 15:49-18:50, 20:45-22:67, 25:55-67, 26:4-61.</li> </ul> </li> </ul>

		<p><b><u>Extrinsic Evidence:</u></b></p> <ul style="list-style-type: none"> <li>• Claim Construction Opinion, <i>Kewazinga Corp. v. Microsoft Corp.</i>, No. 1:18-CV-4500-GHW, 2019 WL 3423352 (S.D.N.Y. July 29, 2019)</li> <li>• Testimony of Dr. Jeffrey Lubin</li> <li>• Testimony of Dr. Keith J. Hanna <ul style="list-style-type: none"> <li>○ Initial Expert Declaration in <i>Kewazinga v. Microsoft</i> (Dkt. No. 43)</li> <li>○ Supplemental Expert Declaration in <i>Kewazinga v. Microsoft</i> (Dkt. No. 48)</li> <li>○ 3/14/2019 Deposition in <i>Kewazinga v. Microsoft</i>, at 16:2-16, 40:4-14, 108:4-109:3, 110:10-111:8, 119:5-19, 131:3-20</li> </ul> </li> <li>• Briefing in <i>Kewazinga Corp. v. Microsoft Corp.</i>, No.1:18-cv-4500-GHW (S.D.N.Y.) <ul style="list-style-type: none"> <li>○ Kewazinga opening claim construction brief (Dkt. No. 42)</li> <li>○ Kewazinga reply claim construction brief (Dkt. No. 47)</li> <li>○ Kewazinga letter brief regarding claim construction (Dkt. No. 51)</li> <li>○ Microsoft motion for summary judgment (Dkt. No. 189) and Carraway Decl. in support (Dkt. No. 192)</li> </ul> </li> </ul>
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Terms and Phrases	Kewazinga's Proposed Construction and Identification of Evidence	Google's Proposed Construction and Identification of Evidence
		<ul style="list-style-type: none"> <li>○ Kewazinga response to Microsoft's motion for summary judgment (Dkt. No. 246)</li> <li>○ Microsoft reply in support of its motion for summary judgment (Dkt. No. 265)</li> <li>• Testimony of Dr. Peter J. Burt <ul style="list-style-type: none"> <li>○ 12/10/2019 Deposition in <i>Kewazinga v. Microsoft</i>, at 19:22-20:21, 31:14-25.</li> </ul> </li> <li>• Testimony of Dr. Rakesh "Teddy" Kumar <ul style="list-style-type: none"> <li>○ 11/21/2019 Deposition in <i>Kewazinga v. Microsoft</i>, at 18:8-13, 19:1-9, 43:22-44:11.</li> </ul> </li> <li>• Google additionally reserves the right to rely on testimony from the named inventors of the patents-in-suit and Sarnoff/SRI employees who were involved with the development of the technology claimed in the patents-in-suit.</li> </ul>
array of cameras ('226 patent, claims 55, 119; '325 patent, claims 1, 5, 6, 10, 14, 15, 29)	No construction is necessary. However, if the Court rules that one is necessary, Kewazinga proposes the following construction:  <i>a camera configuration wherein the configuration can be created over time by moving cameras</i>	<i>a set of multiple cameras, each fixed in relation to each other</i>  <b><u>Intrinsic Evidence:</u></b> <ul style="list-style-type: none"> <li>• '226 patent at Figs. 1, 2b-e, 3, 4, 7a, 8; claims 1, 54, 73, 1:15-16, 1:63-2:34, 2:59-63, 3:56-</li> </ul>

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	<p><b><u>Intrinsic Evidence:</u></b></p> <ul style="list-style-type: none"> <li>• '226 patent at 3:54-65, 4:22-44, 4:56-5:24, 6:7-38, 7:20-52, 8:17-9:20, 9:46-52, 13:19-27, 13:55-61, Figs. 1, 2a-2e, 3, 4, 5, 6, 7a</li> <li>• '325 patent at 3:65-4:8, 4:32-56, 5:1-36, 6:18-48, 7:31-64, 8:28-9:32, 9:58-64, 15:9-16, 18:59-20:53, Figs. 1, 2a-2e, 3, 4, 5, 6, 7a, 11, 12, claims 1 and 10</li> </ul> <p><b><u>Extrinsic Evidence:</u></b></p> <ul style="list-style-type: none"> <li>• Testimony of Dr. Jeffrey Lubin</li> <li>• Although Kewazinga disputes that the Claim Construction Opinion, <i>Kewazinga Corp. v. Microsoft Corp.</i>, No. 1:18-CV-4500-GHW, 2019 WL 3423352 (S.D.N.Y. July 29, 2019) is "extrinsic evidence" within the meaning set forth in <i>Phillips v. AWH Corp.</i>, 415 F.3d 1303, 1317-18 (Fed. Cir. 2005), Kewazinga may cite it as well</li> <li>• Although Kewazinga disputes that briefing, filings, and deposition transcripts in <i>Kewazinga Corp. v. Microsoft Corp.</i>, No.1:18-cv-4500-GHW (S.D.N.Y.) is "extrinsic evidence" within the meaning set forth in <i>Phillips v. AWH Corp.</i>, 415 F.3d 1303, 1317-18 (Fed. Cir. 2005), Kewazinga may cite them as well</li> </ul>	<p>65, 4:12-18, 4:56-5:21, 6:26-38, 7:53-8:15, 10:8-53, 17:52-60.</p> <ul style="list-style-type: none"> <li>• '325 patent at Figs. 1, 2b-e, 3, 4, 7a, 8, 11, 12; claims 1, 4, 10, 13, 22-24; 1:20-21, 2:1-37, 2:61-63, 3:66-4:9, 4:22-28, 5:1-33, 6:37-48, 7:65-8:25, 10:19-63, 19:2-20:27, 20:67-21:4.</li> <li>• U.S. Patent No. 5,708,469 ("469 patent) at Figs. 1-2, 3:48-56; 5:38-6:39.</li> </ul> <p><b><u>Extrinsic Evidence:</u></b></p> <ul style="list-style-type: none"> <li>• Testimony of Dr. Jeffrey Lubin</li> <li>• Testimony of Dr. Keith J. Hanna <ul style="list-style-type: none"> <li>○ Initial Expert Declaration in <i>Kewazinga v. Microsoft</i> (Dkt. No. 43)</li> <li>○ Supplemental Expert Declaration in <i>Kewazinga v. Microsoft</i> (Dkt. No. 48)</li> <li>○ 3/14/2019 Deposition in <i>Kewazinga v. Microsoft</i> (Dkt. No. 52-2), at 14:6-24, 47:5-15, 58:14-59:6, 60:16-61:10, 61:11-62:8, 62:9-18, 63:3-22, 66:2-13, 70:2-71:1, 76:9-20, 153:17-23.</li> </ul> </li> <li>• Claim Construction Opinion, <i>Kewazinga Corp. v. Microsoft Corp.</i>, No. 1:18-CV-4500-GHW, 2019 WL 3423352 (S.D.N.Y. July 29, 2019)</li> </ul>

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	<ul style="list-style-type: none"> <li>• Random House Webster's College Dictionary (1991) at 76 (definition of "array")</li> </ul>	<ul style="list-style-type: none"> <li>• Briefing in <i>Kewazinga Corp. v. Microsoft Corp.</i>, No.1:18-cv-4500-GHW (S.D.N.Y.)               <ul style="list-style-type: none"> <li>○ Kewazinga opening claim construction brief (Dkt. No. 42)</li> <li>○ Kewazinga reply claim construction brief (Dkt. No. 47)</li> <li>○ Kewazinga letter brief regarding claim construction (Dkt. No. 51)</li> </ul> </li> <li>• Testimony of Dr. Rakesh "Teddy" Kumar               <ul style="list-style-type: none"> <li>○ 11/21/2019 Deposition in <i>Kewazinga v. Microsoft</i>, at 43:22-44:11, 70:2-15, 114:11-25, 135:13-136:2.</li> </ul> </li> <li>• Google additionally reserves the right to rely on testimony from the named inventors of the patents-in-suit and Sarnoff/SRI employees who were involved with the development of the technology claimed in the patents-in-suit.</li> </ul>